

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

<b>In re:</b>	)	<b>Case No. 08-35653</b>
	)	
<b>CIRCUIT CITY STORES, INC., et al.,</b>	)	<b>Chapter 11</b>
	)	
<b>Debtors.</b>	)	<b>(Jointly Administered)</b>
	)	

**MOTION FOR ADMISSION  
PRO HAC VICE OF FRANK T. PEPLER**

Lawrence A. Katz (“Movant”), hereby moves the Court, pursuant to Local Bankruptcy Rule 2090-1(E), to enter an order authorizing Frank T. Pepler (“Mr. Pepler”), an attorney with the law firm of Pepler Mastromonaco LLP, to appear *pro hac vice* in the referenced bankruptcy case before the United States Bankruptcy Court for the Eastern District of Virginia (the “Bankruptcy Case”) to represent Morgan Hill Retail Venture, LP (“Morgan Hill”) and in support of this Motion, the Movant states as follows:

1. Movant is a member in good standing of the Bar of the Supreme Court of Virginia and an attorney admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia.
2. Mr. Pepler is a member in good standing of the State Bar of California. There are no disciplinary proceedings pending against Mr. Pepler in any jurisdiction in which he is admitted to practice.
3. Movant requests that this Court authorize Mr. Pepler to file pleadings in, to appear and be heard at hearings concerning, and to otherwise participate in the Bankruptcy Case

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*Counsel to Morgan Hill Retail Venture, LP*

105547-266319  
MC1 # 269988

(and related proceedings) on behalf of Morgan Hill.

4. Movant shall serve as co-counsel with Mr. Pepler in the Bankruptcy Case (and related proceedings).

5. Notice of this Motion has been given to (a) the Office of the United States Trustee, (b) counsel for the Debtors, and (c) all persons receiving electronic notice in the Bankruptcy Case as of the service hereof.

WHEREFORE, Movant respectfully requests that this Court enter an order authorizing Frank T. Pepler to appear *pro hac vice* in the Bankruptcy Case in substantially the same form as Exhibit A attached hereto and grant such other and further relief as is just.

Dated: December 23, 2008

/s/ Lawrence A. Katz

Movant

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### CERTIFICATE OF SERVICE

I hereby certify that on the 23<sup>rd</sup> day of December 2008, a true and accurate copy of the foregoing was electronically filed with the Clerk of the Bankruptcy Court for the Eastern District of Virginia, Richmond Division, using the CM/ECF system, which thereby caused the above to be served electronically on all registered users of the ECF system that have filed notices of appearance in this matter, and mailed, by U.S. mail, first class, postage prepaid, to all persons appearing below:

Robert B. Van Arsdale, Esq.  
Office of the United States Trustee  
701 East Broad St., Suite 4304  
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*Assistant United States Trustee*

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/s/ Lawrence A. Katz  
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